EXHIBIT B

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GLEN E. FRIEDMAN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

GLEN E. FRIEDMAN Plaintiffs, v. THIERRY GUETTA a/k/a MR. BRAINWASH; and DOES 1 though 10, inclusive, Defendants.	Case No. CV10-0014 DDP (JCx) Honorable Dean D. Pregerson Complaint Filed: January 4, 2010 **PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS, SET THREE TO DEFENDANT THIERRY GUETTA**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PROPOUNDING PARTY: **PLAINTIFF**

RESPONDING PARTY: **THIERRY GUETTA**

SET NUMBER: **THREE**

Pursuant to Federal Rules of Civil Procedure, Rule 34, plaintiff demands that the above-named defendant(s) produce for inspection and copying each of the documents or categories of documents hereinafter described, by delivering them to the offices of THE LINDE LAW FIRM, 9000 Sunset Blvd., #1025, Los Angeles, CA 90069.

A written response under oath to this demand is also required of defendants within 30 days after service of this request (33 days if this demand is served by mail), consisting of either a statement that defendant will comply with this demand, or a statement that defendant lacks the ability to comply with this demand, or an objection to the demand. If objection is made to only part of an item or category of item requested in this demand, said response shall contain a statement of compliance, or a representation of inability to comply with respect to the remainder of that item or category.

A statement that defendant will comply with this demand shall state that the production and inspection will be allowed either in whole or in part and that all documents or things in a demanded category that are in the possession, custody or control of defendant and to which no objection is being made will be included in the production.

A representation of inability to comply with any particular item or category of items demanded shall affirm that a diligent search and a reasonable inquiry has been made in an effort to comply with the demand and the statement shall also specify whether the inability to comply is because the particular item or category of item, (a) has never existed, (b) has been destroyed, (c) has been lost, misplaced, or stolen, or (d) has never been, or is no longer, in the possession, custody or control of defendant, as well as the name and address of any natural person or organization known or believed by defendant to have possession, custody, or control of that item or category of item.

DEFINITIONS

When appearing in all capital letters, the following words and/or phrases shall have the following meanings:

"**DOCUMENT**" includes, but is not limited to, writings, drawings, graphs, charts, photographs, phone records, and other data compilations from which information may be obtained. This includes originals and all copies, unless identical, regardless of origin or location, or written, recorded and graphic matter, however produced or reproduced, formal or informal, whether for internal or external use, including, but not limited to: correspondence, e-mails, letters, memoranda, notes, reports, contracts, agreements, directives, instructions, court papers, lists of persons or things, blueprints, sketches, graphic representations, maps, books, pamphlets, canceled checks, mechanical and electrical sound recordings, charts, catalogs, tapes, indices, data sheets, statistical tables and diagrams.

"**PROFITS**" shall mean and refer to YOUR gross revenue minus expenses as defined in 17 U.S.C. section 504(B).

"YOU" and **"YOUR"** shall mean and refer to the Responding Party, its employees, agents, officers, directors, servants, representatives, companies, including subsidiaries, as well as anyone acting on its behalf or at its request. Defendant cannot refuse to respond to interrogatories because the information requested is only in the possession of a subsidiary. In re ATM Fee Antitrust Litigation, 233 F.R.D. 542, 545 (N.D. CA 2005)("federal law requires that a parent respond to an interrogatory under FRCP Rule 33 with information from a subsidiary if it has access to that information and if the information is relevant and not privileged. "). See also Uniden Am. Corp v. Ericsson, Inc., 181 F.R.D. 302, 306 (M.D.N.C. 1998)(Defendant had control and therefore required to produce documents in the possession of its sister company).

REQUESTS FOR PRODUCTION

34. All DOCUMENTS that refer in whole or in part to any and all sales made at YOUR "Mr. Brainwash presents Life Is Beautiful" exhibit, held in 2008 at 6121 N. Sunset Blvd., Los Angeles, CA 90028.

35. All DOCUMENTS that refer in whole or in part to any and all costs incurred by YOU in the production of YOUR "Mr. Brainwash presents Life Is Beautiful" exhibit, held in 2008 at 6121 N. Sunset Blvd., Los Angeles, CA 90028.

36. Please produce any and all e-mails sent or received by any @mrbrainwash.com e-mail address, including but not limited to fineart@mrbrainwash.com and info@mrbrainwash.com, that refers in whole or in part to Run-DMC.

37. Please produce all recordings of the deposition of Thierry Guetta taken on November 15, 2010 in the instant case.

38. Please produce all correspondence between Patrick Guetta and Thierry Guetta that refers in whole or in part to Run-DMC.

39. Please produce all correspondence between Patrick Guetta and Thierry Guetta that refers in whole or in part to Glen E. Friedman.

40. Please produce all correspondence between Marc Guetta and Thierry Guetta that refers in whole or in part to Run-DMC.

41. Please produce all correspondence between Marc Guetta and Thierry Guetta that refers in whole or in part to Glen E. Friedman.

Dated: 11/18, 2010

THE LINDE LAW FIRM

By: ______________________

Douglas A. Linde
Erica L. Allen
Attorneys for Plaintiff
GLEN E. FRIEDMAN

EXHIBIT 1

EXHIBIT 2

EXHIBIT 3

EXHIBIT 4

NO SMOKING

EXHIBIT 5

PROOF OF SERVICE
(FRCP 5)

I am employed in the county of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 9000 Sunset Boulevard, Ste. 1025, Los Angeles, CA 90069.

On **November 19, 2010** I served **REQUEST FOR PRODUCTION, SET THREE** on the interested parties to this action by the following means:

X by placing _____ the original _____ a true copy enclosed in a sealed envelope(s) addressed as stated on the attached Service List.

X **BY MAIL.** I deposited such envelope(s) in the mail in Los Angeles, California. The envelope(s) was mailed with postage thereon fully prepaid.

_________ **BY PERSONAL SERVICE.** I caused to be delivered such envelope(s) by hand to the addressee(s) stated on the attached Service List.

________ **BY FACSIMILE.** I sent by facsimile a copy of the above-described document to the interested parties identified on the attached Service List.

________ **BY E-MAIL.** I sent by electronic mail a .pdf copy of the fully executed above-described document to the interested parties identified on the attached Service List.

Executed on **November 19, 2010** in Los Angeles, California.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Jeffrey T. Allen

Name **Signature**

SERVICE LIST

Alan S. Gutman
John Juenger
LAW OFFICES OF ALAN S. GUTMAN
9401 Wilshire Blvd., Ste. 575
Beverly Hills, CA 90212